

# **James Benny Jackson v. Oil-Dri Corporation of America, et al.**

**Sandra Wheeler**

**September 7, 2017**



**Mississippi - Louisiana - Tennessee - New York**  
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**EXHIBIT**

**I**

tabbles®

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1 do you have an opinion as to whether he was  
2 substantially limited or even affected in one of  
3 these major life activities. I'm going to go through  
4 the list.

5 A. Are you talking about on the day that I saw  
6 him?

7 Q. No. I'm talking about in July of 2015.

8 A. Because I never saw him before that.

9 Q. Well, I'm going to go through the list and  
10 you just tell me if you have an opinion about his  
11 abilities in July of 2015. Was he limited in his  
12 ability to care for himself; do you know?

13 A. I don't know.

14 Q. Do you have an opinion whether he was  
15 limited in his ability to perform manual tasks in  
16 July 2015?

17 A. I do not know.

18 Q. Do you have an opinion as to whether he was  
19 limited in his ability to see in July of 2015?

20 A. I do not know.

21 Q. With regard to his ability to hear?

22 A. I do not know.

23 Q. With regard to his ability to eat?

24 A. I do not know.

25 Q. With regard to his ability to sleep?

Sandra Wheeler 9/7/2017

1 A. I do not know.

2 Q. With regard to his ability to walk?

3 A. I do not know.

4 Q. His ability to stand?

5 A. I do not know.

6 Q. His ability to lift?

7 A. I do not know.

8 Q. His ability to bend?

9 A. I do not know.

10 Q. His ability to speak?

11 A. I do not know.

12 Q. His ability to breathe?

13 A. I do not know.

14 Q. His ability to learn?

15 A. I do not know.

16 MR. WOODRUFF: I'm sorry. I just  
17 can't hear. Is there any way we can get the phone  
18 closer to her? I can't hear what she's saying.

19 MS. CANNADY: I'll scoot it a little  
20 bit closer. It's getting farther from me. Where did  
21 I leave off with?

22 MR. WOODRUFF: I can hear you fine. I  
23 just can't hear her.

24 THE COURT REPORTER: Ability to learn.

25 MS. CANNADY: Did she answer?

Sandra Wheeler 9/7/2017

1 THE COURT REPORTER: I do not know.

2 Q. (Ms. Cannady) His ability to read?

3 A. I do not know.

4 Q. His ability to concentrate?

5 A. I do not know.

6 Q. His ability to think?

7 A. I do not know.

8 Q. His ability to communicate?

9 A. I do not know.

10 Q. His ability to work?

11 A. I do not know.

12 Q. What about did he have any condition that  
13 affected his immune system in July of 2015?

14 A. I do not know.

15 Q. Normal cell growth in 2015?

16 A. I do not know.

17 Q. His digestive system in July 2015?

18 A. I do not know.

19 Q. His bowels?

20 A. I do not know.

21 Q. His bladder?

22 A. I do not know.

23 Q. His neurological system?

24 A. I do not know.

25 Q. His brain?

Sandra Wheeler 9/7/2017

1 A. I do not know.

2 Q. His respiratory system?

3 A. I do not know.

4 Q. His circulatory system?

5 A. I do not know.

6 Q. His endocrine system?

7 A. I do not know.

8 Q. His reproductive system or functions?

9 A. I do not know.

10 Q. Do you have any knowledge whatsoever about  
11 his health condition in July of 2015?

12 A. I do not know.

13 MS. CANNADY: Okay. That's all I  
14 have.

15 MR. WOODRUFF: No questions. Thank  
16 you.

17 THE COURT REPORTER: Ron, this  
18 deposition I'm taking for Ginger Brooks and they  
19 require me to get on the record whether you order a  
20 copy or not. Can you state that you want a copy of  
21 all three depositions if you do?

22 MR. WOODRUFF: We do want a copy.

23 (Deposition concluded at 3:38 p.m.)

24

25